

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PROJECT VERITAS and PROJECT	:
VERITAS ACTION FUND,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
JAMES O'KEEFE, TRANSPARENCY 1,	:
LLC d/b/a O'KEEFE MEDIA GROUP,	:
ANTHONY IATROPOULOS, and RC	:
MAXWELL,	:
	:
Defendants.	:
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Civil Action No. 7:23-cv-04533

**[PROPOSED] ORDER TO SHOW  
CAUSE FOR WITHDRAWAL OF  
COUNSEL**

Upon the Affidavit of Jay M. Wolman, affirmed the 18<sup>th</sup> day of December, 2024, and upon the memorandum in support hereof, it is

ORDERED that Plaintiffs Project Veritas and Project Veritas Action Fund show cause before a motion term of this Court, via Zoom conference or in-person at Room \_\_\_\_\_, United States Courthouse, 300 Quarropas Street, in the City of White Plains, in the County of Westchester, in the State of New York, on \_\_\_\_\_, \_\_\_\_\_, at \_\_\_\_\_ o'clock in the \_\_\_\_\_noon thereof, or as soon thereafter as all necessary persons may be heard, why an order should not be issued pursuant to Local Civil Rule 1.4 relieving Attorney Jay M. Wolman and Randazza Legal Group, PLLC, from the representation of Plaintiffs and allowing the withdrawal of the same; and it is further

ORDERED that any opposition to the relief requested shall be filed on or before \_\_\_\_\_, \_\_\_\_\_; and it is further

ORDERED that, sufficient reason having been shown therefor, pending Plaintiffs' retention of successor counsel, all proceedings in this matter are STAYED and all deadlines extended by 60 days; and it is further

ORDERED that service of a copy of this order and annexed affidavit and memorandum upon Plaintiff by electronic mail on or before \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon, \_\_\_\_\_, \_\_\_\_\_, shall be deemed good and sufficient service thereof.

DATED: White Plains, New York

ISSUED: \_\_\_\_\_M

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U.S.D.J.

Civil Action No. 7:23-cv-04533

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 19, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Copies have also been served upon Defendant R.C. Maxwell via electronic mail: [rc@rcmaxwell.com](mailto:rc@rcmaxwell.com), and upon Plaintiffs as follows:

Project Veritas: To Ben Wetmore, President, via electronic mail: [benwetmore@protonmail.com](mailto:benwetmore@protonmail.com) & [ben@projectveritas.com](mailto:ben@projectveritas.com) and via First class mail, postage prepaid: 4700 Millenia Blvd., Ste. 500, Orlando, FL 32839; and

Project Veritas Action Fund: To Joseph Barton, President, via electronic mail: [joseph.j.barton@gmail.com](mailto:joseph.j.barton@gmail.com) and via First class mail, postage prepaid: 4700 Millenia Blvd., Ste. 500, Orlando, FL 32839

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)